

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Albert Russo PO Box 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee	
In re: Sarwan Singh Debtor(s)	Case No. 22-12002 / MBK Hearing Date: May 25, 2022 10:00 am Judge: Michael B. Kaplan Chapter: 13

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

The current Plan does not specify treatment of BMO Harris Bank NA under the Plan.

The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4): - Debtors bank account balance as of the date of filing is \$17,486.52, and debtor's half is \$8,743.23 (joint acct with non-filing spouse). After exemption there is \$1,016.76 non-exempt equity. Schedule B only reports balance of \$7,726.50. As a result, there must be a \$1,016 minimum dividend to general unsecured creditors.

The debtor's Plan proposes an order of distribution that is contrary to the Trustee's recommended order of distribution, and does not provide for equal monthly payments as required by §1325(a)(5)(iii)(I).

-BMO Harris Bank NA filed a secured claim for a judgment, listed in schedules as an unsecured claim.

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: David Martin, Staff Attorney